

BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE

03 FEB 18 PM 4 30

In re:

Broadband Innovations, LLC Application for a
Certificate to Provide Competing Local
Telecommunications Services within the State
of Tennessee

TN REGULATORY AUTHORITY
Docket No. 02-00819
DOCKET ROOM

FIRST ROUND OF DISCOVERY REQUESTS TO BROADBAND INNOVATIONS

Aeneas Communications, LLC hereby submits the following interrogatories to
Broadband Innovations, LLC.

Preliminary Matters and Definitions

When not otherwise specified, the term "Broadband" refers to Broadband Innovations, LLC and/or to any affiliated corporate entity engaging in the offering of regulated telephone services in Tennessee.

With respect to each of the following interrogatories, in addition to supplying the information requested, please identify any and all documents that support, refer to, or evidence the subject matter of each interrogatory in your answers thereto. If any or all of the documents identified herein are no longer in your possession, custody or control because of destruction, loss, or other reason, then you are requested to identify each such document fully, including the nature and type of the document, its date, the identity of the person who prepared the document, and the identity of the person or entity for whom it was prepared, and to the extent possible, you are requested to summarize the contents of the document and state the manner and date of the disposition thereof. If any of the requested documents are objected to or not produced on the basis of privilege, please include in your response to production, for each document, a written statement evidencing:

- a. The nature and type of the document;
- b. The date;
- c. The author of the document;
- d. The recipient;
- e. The sender; and
- f. A brief description of the contents sufficient to allow the TRA to rule on a motion to compel.

Consistent with the preceding definitions and preliminary matters, answer under oath the following:

INTERROGATORIES

1. Is Broadband Innovations currently authorized to operate in any state? If so, list each such state and provide a copy of that state's certificate of authority.

ANSWER:

2. The application states that Mr. Curtis Graves was the founder of DTI and its predecessor, Digital Transmissions, Inc. Did either company declare bankruptcy? If so, provide a copy of the bankruptcy petition and all orders entered by the bankruptcy court in that proceeding.

ANSWER:

3. The application also mentions a company called Teleci, Inc., where Mr. Graves was employed between 1969 and 1972 and between 1975 and 1979. Was Teleci ever charged or convicted of a federal crime concerning the failure to file tax returns? If so, provide a copy of the indictment and any orders entered by the Court concerning sentencing. Explain Mr. Graves' role, if any, in that proceeding.

ANSWER:

4. The application states that Mr. Graves worked for a company called Profitel. Explain the reasons for Mr. Graves' departure from that company.

ANSWER:

5. Did Mr. Graves ever own a company called the American Guardian Agency? If so, provide copies of all lawsuits and final judgments rendered against that company.

ANSWER:

6. List the current address of Broadband Innovations and list all property currently owned or leased by Broadband Innovations.

ANSWER:

7. List all current employees of Broadband Innovations and briefly describe the job title and qualifications of each one.

ANSWER:

8. List all previous employees of Broadband Innovations and the dates of their employment.

ANSWER:

9. Provide copies of all correspondence, including but not limited to, e-mails, letters, contracts (including drafts) and notes of meetings between Curtis Graves, or anyone representing Broadband Innovations, and anyone representing Jackson Energy Authority ("JEA").

ANSWER:

10. Are the members of Broadband Innovations today the same members listed in the application? If not, describe and explain any changes to the membership.

ANSWER:

11. Is it true that it was announced at the Jackson City Council on May 7, 2002 that JEA's telephone service is "going to be delivered by . . . Mr. Curtis Graves" who "will be our partner to bring telephone service over our system"?

ANSWER:

12. Has Broadband Innovations ever submitted a bid to JEA to provide any service for, or on behalf of, JEA? If so, provide copies of all such bids.

ANSWER:

13. In the "Projected Statement of Income" submitted with the Application, Broadband estimates business and residential revenue in the years 1, 2 and 3. How many customers and how many access lines are associated with each of those revenue estimates? In

what cities and counties are those estimated customers located? Specify how many of those estimated customers are located in each market.

ANSWER:

14. What is the basis of the estimated revenue for Reciprocal Trunking?

ANSWER:

15. In the "Projected Statement of Income," explain the basis for the estimated operating expenses for "residential telephone" and "business telephone." State all assumptions and provide the basis of each assumption.

ANSWER:

16. Estimate how many employees the company will have in years 1, 2 and 3.

ANSWER:

17. Explain how Broadband can expect to receive approximately \$1.25 million in operating revenue in year 1 with a total marketing expense of \$51,300.

ANSWER:

Respectfully submitted,

By: Henry Walker

Henry Walker

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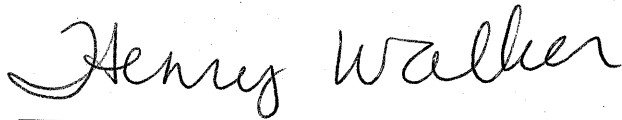
(615) 252-2363

Counsel for Aeneas Communications, LLC

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served on the parties of record, via hand-delivery, overnight delivery or U.S. Mail, postage prepaid, addressed as follows on this 18th day of February, 2003:

Patrick D. Cooper, Esq.
Early, Lennon, Crocker & Bartosiewicz
900 Commercial Building
Kalamazoo, Michigan 49007-4752



Henry Walker